

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NICHOLAS MARTIN on behalf of himself and	)	
others similarly situated,	)	
	)	No. 11-cv-03104
Plaintiff,	)	
v.	)	Judge Charles P. Kocoras
	)	
MIDLAND FUNDING, LLC,	)	Magistrate Judge Morton Denlow
	)	
Defendant.	)	

**MIDLAND FUNDING LLC’S AGREED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant, Midland Funding, LLC (“Midland”), by its attorneys, Dykema Gossett PLLC, and for its Agreed Motion for Extension of Time to Respond to Plaintiff’s Complaint, states as follows:

1. Plaintiff’s Complaint was filed on May 10, 2011. (Dkt. No. 1.) On or about May 11, 2011, Midland was served with the Complaint and Summons. (*See* Dkt. No. 7.) Thus, MCM’s responsive pleading was due on June 1, 2011. (*See id.*)
2. Counsel for Midland was only recently retained, and requires additional time to properly investigate the allegations, to formulate an appropriate response, and to discuss settlement with Plaintiff’s counsel.
3. On June 6, 2011, Midland’s counsel communicated with Plaintiff’s counsel regarding this motion and Plaintiff’s counsel has agreed to an extension of time through July 6, 2011, for Midland to file its response to the Complaint.
4. Therefore, Midland requests additional time, up to and including July 6, 2011, to file its responsive pleading to Plaintiff’s Complaint.

WHEREFORE, Defendant, Midland Funding, LLC, respectfully requests this Court grant an extension of time, up to and including July 6, 2011, to file its responsive pleading to Plaintiff's Complaint and for any other further relief this Court deems just and appropriate.

Dated: June 6, 2011

Respectfully submitted,

**MIDLAND FUNDING LLC**

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**CERTIFICATE OF SERVICE**

I hereby certify that on **June 6, 2011**, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Alexander H. Burke (aburke@burkelawllc.com)

s/ J. Richard Madamba

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